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Counsel to Plaintiff RDC Liquidating Trust

UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NEW YORK

In re:

ROCHESTER DRUG CO-OPERATIVE, INC.

Debtor.

Advisory Trust Group, LLC, as trustee of the RDC LIQUIDATING TRUST,

Plaintiff.

v.

LAURENCE F. DOUD III, DONALD ARTHUR, STEPHEN GIROUX, CHRISTOPHER CASEY, GARRY MROZEK, RICHARD KLENK, SHERWOOD KLEIN, JOE LECH, BORIS MANTELL, JOSEPH SCOTT MISKOVSKY, and PAUL PAGNOTTA, individually as members of the Debtor's Board of Directors,

Defendants.

Chapter 11

Case No. 20-20230 (PRW)

Adv. Proc. No. 22-02073 (PRW)

STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC

("Plaintiff"), successor in interest to Rochester Drug Co-Operative, Inc., and defendant, Richard

Klenk ("Defendant," and together with Plaintiff, the "Parties"), by and through their undersigned attorneys, hereby stipulate:

WHEREAS, on March 8, 2022, Plaintiff filed a complaint (the "Complaint") against Defendants, and the summons (the "Summons") was issued on March 9, 2022; and

WHEREAS, on or after March 9, 2022, Defendant was served with the Summons and Complaint.

NOW THEREFORE, the Parties stipulate and agree as follows:

- Subject to this Court's approval, the time by which Defendant is required to answer 1. or otherwise respond to the Complaint is extended through and including April 30, 2022.
- Defendant does not challenge personal jurisdiction and waives any objection to 2. service of process of the Summons and Complaint in this adversary proceeding.

Respectfully submitted,

Dated: March 21, Dated: March 21, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf Jeffrey A/Carlino

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ischarf@pszjlaw.com Counsel to Defendant Richard Klenk

Counsel to Plaintiff RDC Liquidating Trust

SO ORDERED:

DATED:

HON. PAUL R. WARREN Rochester, New York

United States Bankruptcy Judge

The Calumet Building

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Buffalo, MY 14202

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